

EXHIBIT B

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Crowdflower Offers to Buy Off Plaintiffs to Avoid Nationwide Lawsuit for Minimum Wages

by Ellen Doyle

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Purporting to rely on recent U.S. Supreme Court case, CrowdFlower tries to terminate minimum wage lawsuit brought against it by offering money to named plaintiffs 2 weeks before hearing on conditional class certification.

CrowdFlower, Inc., a San Francisco-based technology company, which boasts the “world’s largest workforce,” made a motion Friday to dismiss claims by two of its millions of online U.S. workers, who claim that CrowdFlower violates minimum wage laws. CrowdFlower’s chief executive, Lucas Biewald, has publicly stated that the company pays its workforce \$2 to \$3 per hour.

Many of the workers are in CrowdFlower’s home city, San Francisco, where the minimum wage is over \$10 per hour. CrowdFlower claims the workers are independent contractors, not employees, and that they are not entitled to the rights of employees, such as the minimum wage.

Why does CrowdFlower contend the claims should be dismissed? Because CrowdFlower offered the two plaintiffs money to settle, which they did not accept, because they wanted to be faithful to the millions of workers they wish to represent.

The case, Otey v CrowdFlower, is before Judge Jon S. Tigar in the U.S. District Court in San Francisco. CrowdFlower’s motion comes only two weeks before the August 2, 2013 hearing on the plaintiffs’ motion to publish notice of the case to millions of CrowdFlower workers, and notify them of their statutory opportunity to participate in the suit. CrowdFlower claims its workers are not interested in joining the case, but the court has not yet authorized dissemination of the notice.

As CrowdFlower’s motion shows, the company made repeated attempts to buy off the two plaintiffs so that they would not represent the millions of other CrowdFlower workers. CrowdFlower recently offered plaintiff Mary Greth \$15,000.00, and offered plaintiff Chris Otey \$2,148. CrowdFlower, relying on its own interpretation of a recent U.S. Supreme Court case, Genesis Health Corp. v Symczyk, contends that just because the company made the offers, the two plaintiffs cannot the represent the millions of others, even though the plaintiffs rejected those offers.

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